

## **REMARKS/ARGUMENTS**

### **1.) Claim Rejections – 35 U.S.C. §102(b)**

The Examiner has rejected claims 30-58 as being anticipated by McCanne, *et al.* (U.S. Patent No. 6,415,323). The Applicants traverse the rejections.

It is to be remembered that anticipation requires that the disclosure of a single piece of prior art reveals **every** element, or limitation, of a claimed invention. Furthermore, the limitations that must be met by an anticipatory reference are those set forth in each statement of function in a claims limitation, and such a limitation cannot be met by an element in a reference that performs a different function, even though it may be part of a device embodying the same general overall concept. Whereas McCanne fails to anticipate each and every limitation of claims 30-58, those claims are not anticipated thereby.

Claim 30 recites:

30. A method for routing in a telecommunications system a service request related to a service, comprising the steps of:  
receiving in a communication server entity a service request containing a service identifier which identifies said service;  
obtaining addressing information related to said service identifier;  
routing said service request using said addressing information; and,  
checking a usage rule which grants the usage of said addressing information, wherein the usage rule comprises at least one use condition selected from the group consisting of:  
a time condition defining the maximum time gap for using said addressing information from the first time it is used; and,  
a maximum usage condition defining the number of times said addressing information can be used;  
wherein the step of routing said service request is performed if said check is passed. (emphasis added)

The Applicants' invention is characterized, in part, by the application of usage rules to control the use of certain addressing information for a server entity. When a service request for a service is received at a communication server, addressing information for the requested service is obtained, but the service request is routed only if one of the specified use conditions is satisfied; the use conditions include a time condition that

defines the maximum time gap for using the addressing information from the first time it is used, and a maximum usage condition defining the number of times the addressing information can be used. That combination of elements and functions is not taught by McCanne.

McCanne discloses an anycast redirection service in which a "client contacts an anycast referral node via the anycast service, and the referral node redirects the client to a normally-addressed and routed (unicast) service node." (Column 10, lines 38-43) According to McCanne, service nodes (SNs) "announce their presence and optional information like system load by sending messages to a group  $G_s$ ." (Column 13, lines 12-14) The anycast referral nodes (ARNs) "monitor [the] messages and build a database of available service nodes, storing and updating the optional attributes for use in load balancing." (Column 13, lines 15-17) Furthermore, "[e]ach database entry must be 'refreshed' by the corresponding SN, otherwise it is 'timed out' and deleted by the ARN(s)." (Column 13, lines 19-21) Thus, McCanne is concerned with managing a database that tracks the availability of service nodes (SNs) that must periodically announce their presence to "refresh" their entry in the database; otherwise, an SN database entry is "timed out" and deleted from the anycast referral node.

In contrast to the teachings of McCanne, the Applicants' invention is directed to controlling the use of address information for a service entity in response to the receipt of a service request. Regardless of whether the service entity is available (*i.e.*, regardless of whether a database entry exists for a service node (SN) in an anycast referral node (ARN) database), usage rules prevent the service request from being routed to the service entity unless at least one of the specified use conditions is satisfied; the use conditions include a time condition that defines the maximum time gap for using the addressing information from the first time it is used, and a maximum usage condition defining the number of times the addressing information can be used. According to the teachings of McCanne, however, if an anycast referral node (ARN) database includes an entry for a service node (SN), "[u]pon receipt of a new service request, the ARN selects a service node from the list of available nodes in the database and redirects the client to that node." (Column 13, 21-23). McCanne does not disclose

any "usage rules" or other limitations on restricting the routing of a service request to a serving entity. Therefore, claim 30 is not anticipated by that reference.

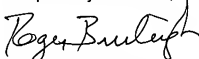
Whereas independent claims 42, 50, 56, 57 and 58 recite limitations analogous to those of claim 30, they are also not anticipated by McCanne. Furthermore, whereas claims 31-41, 43-49 and 51-55 are dependent from claims 30, 42 and 50, respectively, and include the limitations thereof, they are also not anticipated.

### **CONCLUSION**

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 30-58.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



Roger S. Burleigh  
Registration No. 40,542

Date: May 5, 2009

Ericsson Inc.  
6300 Legacy Drive, M/S EVR 1-C-11  
Plano, Texas 75024

(972) 583-5799  
roger.burleigh@ericsson.com